**Virginia Tech's University Libraries responds to the** Office of Science and Technology Policy Request for Information: Public Access to Peer-Reviewed Scholarly Publications Resulting From Federally Funded Research

(http://www.gpo.gov/fdsys/pkg/FR-2011-11-04/html/2011-28623.htm)

(1) Are there steps that agencies could take to grow existing and new markets related to the access and analysis of peer-reviewed publications that result from federally funded scientific research? How can policies for archiving publications and making them publicly accessible be used to grow the economy and improve the productivity of the scientific enterprise? What are the relative costs and benefits of such policies? What type of access to these publications is required to maximize U.S. economic growth and improve the productivity of the American scientific enterprise?

Academic libraries are clearly a stakeholder in necessary services such as archiving and preservation and, therefore, play a key role in enabling access to information and knowledge that can lead to economic growth and productivity. Libraries like Virginia Tech's play an important role in knowledge production; it is critical that our government agencies adopt policies that enable and support unrestricted public access, discovery and re-use of publications resulting from federally funded research.

Successful library services such as hosting open access electronic journals and commercial article databases provide concrete evidence that access to validated scientific research through peer-reviewed articles can occur simultaneously. There are benefits to both mechanisms and they should continue to coexist, making it possible to develop economic growth opportunities. Use and reuse of the nation's intellectual capital is built into our fair use guidelines and these should be allowed to evolve and match pace with evolving scholarship and communications technologies and applications.

(3) What are the pros and cons of centralized and decentralized approaches to managing public access to peer reviewed scholarly publications that result from federally funded research in terms of interoperability, search, development of analytic tools, and other scientific and commercial opportunities? Are there reasons why a Federal agency (or agencies) should maintain custody of all published content, and are there ways that the government can ensure long-term stewardship if content is distributed across multiple private sources?

While it is perhaps easier to have centralized access, there is potential for a single point of failure issues. Conversely, decentralized services enable a variety of capabilities but may increase coordination costs. University libraries are used to collaborating to combine the best of both, working with both the commercial and non-profit sectors to ensure continuous access and long-term preservation.

(5) What steps can be taken by Federal agencies, publishers, and/or scholarly and professional societies to encourage interoperable search, discovery, and analysis capacity across disciplines and archives? What are the minimum core metadata for scholarly publications that must be made available to the public to allow such capabilities? How should Federal agencies make certain that such minimum core metadata associated with peer-reviewed publications resulting from federally funded scientific research are publicly available to ensure that these publications can be easily found and linked to Federal science funding?

It is essential that we create new as well as maintain well-functioning discovery services that are interoperable across computer platforms. A key to this success will be metadata, especially when it contains information necessary for archiving and preservation as well as the potential development of new services. Persistent identifies for authors, publications, and links to data are also essential.

(6) How can Federal agencies that fund science maximize the benefit of public access policies to U.S. taxpayers, and their investment in the peer-reviewed literature, while minimizing burden and costs for stakeholders, including awardee institutions, scientists, publishers, Federal agencies, and libraries?

Maximizing the benefits of public access and investments in peer-reviewed literature should begin with mandates for depositing publications at every federal agency providing public funding for research. NIH set the example with PubMed Central. Since not every federal agency has such a system in place, the Library of Congress could be provided the funding to establish a centralized service for other agencies. Another possibility would be to centralize access through the LoC but distribute the funding support to the public university libraries since they already demonstrated these capabilities through their digital libraries and institutional repositories.

(7) Besides scholarly journal articles, should other types of peer-reviewed publications resulting from federally funded research, such as book chapters and conference proceedings, be covered by these public access policies?

All peer-reviewed publications and gray literature resulting from federally funded research should be publicly accessible. We would also like to see support and encouragement for these publications to evolve beyond text and to be open to expression in new forms of media that use evolving technologies.

(8) What is the appropriate embargo period after publication before the public is granted free access to the full content of peer reviewed scholarly publications resulting from federally funded research? Please describe the empirical basis for the recommended embargo period. Analyses that weigh public and private benefits and account for external market factors, such as competition, price changes, library budgets, and other factors, will be particularly useful. Are there evidence-based arguments that can be made that the delay period should be different for specific disciplines or types of publications?

Embargo periods are borrowed from traditional publication mechanisms and should not be necessary when the public funded the research through taxpayer dollars. Embargo periods can disappear when the research becomes publicly available prior to the academically formatted and peer reviewed publication. The evidence already exists that public access models can coexist with scholarly as well as commercial publications. The prime example is ETD--electronic theses and dissertations that are publicly accessible and coexist with derivative and value-added commercial publications such as articles and books.